

To: Jones, Rhea[Jones.Rhea@epa.gov]
From: Chang, Andy
Sent: Tue 4/12/2016 11:25:42 AM
Subject: SO2 Designations: General Landscape of Public Comments Received

Hi Rhea,

In advance of your APM discussion this afternoon, here is the general landscape of public comments received during the March 1 – March 31 window:

- In total, we received 121 sets of comments

- General categories of comments received:

- Citizens and citizen groups (including Sierra Club) supporting clean air and reductions of SO₂ emissions. These citizens either supported our intended nonattainment designations for certain areas, or urged EPA to ‘change’ the final designation to nonattainment if our intended designation was something less stringent.

- Industry groups have generally not supported our intended nonattainment designations. With the exception of one area in Michigan (St Clair), the operators generally do not believe that the EGU/industrial facilities are causing or contributing to a violation of the NAAQS. Other small companies or jurisdictions who were included in an intended nonattainment area have voiced opposition to being included in said area.

- Industry groups have voiced support for EPA to re-evaluate how we treat and process the use of beta options in AERMOD. Sierra Club has voiced its longstanding assertion that beta options under-predict the modeled maximum impacts.

- Expected source specific areas of high contention, based on the sheer number/type of comments. (Note: this is not an all-inclusive list of sources where comments were received, but is more of a “top 5”)

- Martin Drake Power Plant, (El Paso County, Colorado). EPA’s intended designation was unclassifiable based on what we believed to be unrepresentative met data at the Colorado Springs airport. In addition to Sierra Club, there is an *extremely* vocal citizens group in Colorado Springs re-asserting that the met data from the airport is representative of the facility’s location, and therefore the area should be nonattainment.

- Ameren Labadie (Franklin County, Colorado). EPA’s intended designation was nonattainment based primarily on air dispersion modeling performed by the state using all regulatory defaults showing exceedances of the NAAQS. Sierra Club and citizens have come out

in tremendous support of this intended designation, but industry and some local lawmakers oppose the intended nonattainment designation

- Wagner Generating Station (Anne Arundel County, Maryland). EPA's intended designation was nonattainment based primarily on Sierra Club modeling using all regulatory defaults showing exceedances of the NAAQS. Sierra Club and citizens have come out in tremendous support of this intended designation; industry opposes it.

- Industry has voiced opposition where our intended designation for any area in Texas was nonattainment.

- Gibson Generating Station (Gibson County, Indiana). EPA's intended designation was u/a based on the monitoring vs modeling assessment. Sierra Club and other citizens oppose this action, and industry supports it.

- Areas of contention where we have received new information asserting violations of the NAAQS, and our intended designation was not nonattainment. Under the current confines of the final consent decree, we do not have time to run a second 120 day process. (Note: a full Regional assessment of these comments has not been performed.)

- A.B. Brown (Posey County, Indiana). Our intended designation was unclassifiable based on new limits that would become effective between the 120 day process and April 19, 2016. Sierra Club asserts that the background concentration used in IDEM's modeling was too low, and the subsequent modeled value of 74.95 ppb is inaccurate.

- Martin Drake Power Plant (El Paso County, Colorado). This facility is discussed above.

- Gavin Power Plant (Gallia County, Ohio). Our intended unclassifiable designation was based on Ohio's use of beta options. Sierra Club has rerun AERMOD using Ohio EPA's inputs and the regulatory default options, and has modeled the maximum impact to be upwards of 91 ppb.

- Other issues

- Muskogee Power Plant (Muskogee County, Oklahoma). Our intended designation was nonattainment, but during the public comment period, the facility has provided information they believe meets the "announced for retirement" clause of the CD. Additionally, the facility asserts that it is installing sufficient controls by 2018 to meet the 1-hour standard as a result of obligations under the RH FIP, and that a nonattainment designation adds nothing more than paperwork burden.

- Sandy Creek Energy Station (McLennan County, Texas). Our intended designation was unclassifiable, but during the public comment period, the facility provided information attempting to support the notion that the 2012 CAMD emissions were inaccurate, and therefore its emissions did not trigger the obligation to designate by July 2, 2016.

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